

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, AFL-
CIO, et al.

Plaintiff,

vs.

OFFICE OF PERSONNEL
MANAGEMENT, et al.

Defendant.

Civil Action No. 25-cv-10276

**DECLARATION OF ELENA GOLDSTEIN
IN SUPPORT OF MOTION FOR
ADMISSION *PRO HAC VICE***

I, Elena Goldstein, hereby certify and state:

1. I am Senior Legal Advisor at Democracy Forward Foundation.
2. My business address is 1445 New York Ave NW, Washington, D.C. 20043. My business telephone number is 202-448-9090. My business fax is 202-796-4426. My email address is egoldstein@democracyforward.org.
3. I am a member in good standing of the Bars of New York, the U.S. District Court for the Southern District of New York, the U.S. District Court for the District of Columbia, the U.S. Court of Appeals for the Fifth Circuit, and the Supreme Court of the United States. I have no pending disciplinary proceedings against me in any jurisdiction.
4. I have not been denied admission, been disciplined by, resigned from, surrendered my license to practice before, or withdrawn an application for admission to practice before any bar, or before this Court or any other court.
5. I have not previously had a *pro hac vice* admission to this court (or other admission for a limited purpose under this rule) revoked for misconduct.

6. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts. I have read and agree to comply with the Local Rules of the United States District Court for the District of Massachusetts.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: Washington, D.C.
February 5, 2025

Respectfully submitted,

/s/ Elena Goldstein

Elena Goldstein

(NY Bar No. 4210456)

Democracy Forward Foundation

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Attorney for Plaintiff

CERTIFICATE OF SERVICE

I, Michael T. Anderson, hereby certify that on February 5, 2025, a true copy of the foregoing document was electronically filed through the Court's ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants.

Dated: February 5, 2025
Boston, MA

/s/ Michael T. Anderson
Michael T. Anderson